



MORVILLO PLLC

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June 22, 2023

Application GRANTED. Defense counsel are directed to contact the Second Circuit's CJA Case Budgeting Attorney, Alan Nelson (Alan_Nelson@ca2.uscourts.gov), for purposes of preparing a mega-case budget in this action.

VIA EMAIL

Hon. Jennifer H. Reardon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED.

Jennifer H. Reardon, U.S.D.J.

Date: June 26, 2023

**Re: United States v. Ramon Rodriguez
23-cr-203 (JHR)**

Dear Judge Reardon:

The undersigned represents Ramon Rodriguez, pursuant to the Criminal Justice Act, in the above captioned matter. I write to respectfully request that Your Honor authorize an associate to work more than ten hours on this matter. The associate attorney I propose is Diane Ferrone, Esq. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York. I have worked with her many times in the past and believe her to be an excellent attorney. I respectfully request 100 hours at a rate of \$125 per hour (the presumptive rate for an attorney with Ms. Ferrone's experience).

Mr. Rodriguez is charged with Racketeering Conspiracy. The indictment alleges that the pattern of racketeering activity includes, among others, multiple acts of murder, multiple acts of robbery and multiple offenses involving the distribution of controlled substances.

Ms. Ferrone would assist with reviewing discovery, meeting with Mr. Rodriguez, researching legal issues, investigating the relevant factual background and defenses, drafting motions, and if necessary, preparing for Mr. Rodriguez's defense at trial.

I am highly conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully,

MORVILLO PLLC

BY: _____/s/ _____

Gregory Morvillo